

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE STELLANTIS N.V.
SECURITIES LITIGATION

: 19-CV-6770 (EK) (VMS)

: CLASS ACTION

**NOTICE OF MOTION AND (I) LEAD PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT, PLAN OF ALLOCATION
AND CERTIFICATION OF SETTLEMENT CLASS AND
(II) LEAD COUNSEL'S MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
EXPENSES AND REIMBURSEMENT AWARD TO LEAD PLAINTIFF**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 23(e) and the court's Order Preliminarily Approving Settlement ("Preliminary Approval Order") dated October 15, 2021 (ECF No. 60), Lead Plaintiff Nicholas S. Panitza, on behalf of the Settlement Class, by and through his counsel, Bernstein Liebhard LLP, will move this Court on February 17, 2022, at 9:30 a.m., before the Honorable Eric R. Komitee, for entry of orders and judgments, pursuant to Rule 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the proposed Settlement; (2) approving the proposed Plan of Allocation; (3) certifying the Settlement Class; (4) awarding attorneys' fees, plus expenses in the litigation; and (5) approving an award to Lead Plaintiff pursuant to 15 U.S.C. §78u-4(a)(4) in connection with his representation of the Settlement Class. These motions are based on: (i) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement, Plan of Allocation and Certification of Settlement Class; (ii) the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorney's Fees and Expenses, and Reimbursement Award to Lead Plaintiff; and (iii) the Declaration of Stephanie M. Beige in Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action Settlement, Plan of Allocation and Certification of Settlement Class and (II) Lead

Counsel's Motion for an Award of Attorney's Fees and Expenses, and Reimbursement Award to Lead Plaintiff; the record and proceedings in this Action; and such matters as the Court may consider at the time of the hearing.

A revised [Proposed] Judgment Approving Settlement ("Proposed Final Judgment") was submitted to the Court on August 5, 2021 (ECF No. 57-9). Certain information necessary to finalize the Proposed Final Judgment, such as the number of requests for exclusion from the Class, if any, and disposition of any objections received, if any, is not yet available, and will only be available following the January 27, 2022 deadline for requests for exclusion or objections. Accordingly, Lead Plaintiff will provide the Proposed Final Judgment in final form with his reply papers that will be filed, pursuant to the court's Preliminary Approval Order, no later than seven (7) calendar days prior to the Settlement Fairness Hearing.

DATED: January 13, 2022

By: //Stephanie M. Beige
Stephanie M. Beige

CERTIFICATE OF SERVICE

I hereby certify that the was filed with CM/ECF system on January 13, 2022 and was thereby served upon all parties and counsel registered therein. **Notice of Motion and (I) Lead Plaintiff's Motion For Final Approval of Class Action Settlement, Plan of Allocation and Certification of Settlement Class and (II) Lead Counsel's Motion for an Award of Attorney's Fees and Expenses and Reimbursement to Lead Plaintiff.**

/s/ Stephanie M. Beige
Stephanie M. Beige